

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Ionut DUMITRU, a/k/a Ionut CODREANU

Case No. 2:25-mj-30407

Assigned To : Unassigned

Assign. Date : 6/25/2025

Description: CMP USA v Dumitru  
(SH)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 20, 2025 in the county of Macomb in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. 1326(a)

Unlawful Re-Entry Following Removal from the United States


This criminal complaint is based on these facts:

On or about June 20, 2025, in the Eastern District of Michigan, Southern Division, Ionut DUMITRU, a/k/a Ionut CODREANU, an alien from Romania, was found in the United States after having been denied admission, excluded, deported, and removed there from on or about November 14, 2022, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.

*Complainant's signature*

Sarah A. Soles, U.S. Border Patrol Agent

*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: June 25, 2025City and state: Detroit, MI

*Judge's signature*

Anthony P. Patti, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Sarah A. Soles, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Border Patrol, and I have been employed in this capacity since June of 2009. Currently, I am assigned to the Marysville Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed material from the official immigration file and system automated data relating to Ionut DUMITRU (aka Ionut CODREANU), which attests to the following:
2. Ionut DUMITRU is a twenty-four-year-old male, native and citizen of Romania, who claims to have last entered the United States at or near New York in March of 2023, without being admitted, inspected or paroled by an Immigration Officer.
3. On October 4, 2015, DUMITRU was arrested by the U.S. Border Patrol near Brownsville, Texas. DUMITRU was a juvenile at the time and traveling with his mother. They were served a Notice to Appear and released on their own recognizance on October 5, 2015.
4. On April 13, 2017, an Immigration Judge in Los Angeles, California denied DUMITRU's asylum claim and ordered him to be removed from the United States to Romania. An appeal was filed with the Board of Immigration Appeals, which was ultimately dismissed.
5. DUMITRU claimed to have departed the United States back to Romania on his own accord in 2018. Records confirmed that on December 6, 2018, DUMITRU flew from Miami International Airport to Bucharest, Romania.
7. On August 28, 2022, DUMITRU was arrested by the U.S. Border Patrol near San Ysidro, California, after entering the United States illegally from Mexico. DUMITRU was processed as an Expedited Removal. DUMITRU was removed from the United States to Romania on November 14, 2022, via Los Angeles, California.

8. On or about February 28, 2025, DUMITRU was arrested in Harris County, Texas for misdemeanor theft (\$100-\$750), under the alias name of Ionut CODREANU. A warrant for Failure to Appear was entered on March 14, 2025.
9. On June 20, 2025, DUMITRU was arrested by Clinton Township Police in Clinton Township, Michigan and cited for a violation of MCL 750.167 Disorderly Person – Begging in Public.
10. On June 20, 2025, DUMITRU was encountered by U.S. Border Patrol Agents from the Marysville Border Patrol Station at the Macomb County Jail following a request for assistance from Clinton Township Police. The agents identified DUMITRU as a citizen of Romania that had been previously removed from the United States. Agents placed DUMITRU under arrest and transported him to the Marysville Border Patrol Station for further investigation. Upon further investigation, agents were able to confirm that the warrant issued out of Harris County, Texas for Failure to Appeal is valid, however, non-extraditable.
11. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
12. Review of records from the alien file (A# xxx xxx 270) for DUMITRU and queries in U.S. Department of Homeland Security databases confirm that no record exists of DUMITRU obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal on or about November 14, 2022.
13. Based on the above information, there is probable cause to believe that, on or about June 20, 2025, at or near Clinton Township, in the Eastern District of Michigan, Southern Division, Mount Clemens, an alien from Romania was found in the United States after having been denied admission, excluded,

deported, and removed therefrom on or about November 14, 2022, at or near Los Angeles, California, and not having obtained the express consent from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).



Sarah A. Soles, Border Patrol Agent  
U.S. Department of Homeland Security

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



Honorable Anthony P. Patti  
United States Magistrate Judge

June 25, 2025